

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

CASE NUMBER: 2:06 CR 63

VIKRAM S. BUDDHI

Defendant.

MOTION TO EXTEND THE DEADLINE
FOR PRE-TRIAL MOTIONS UNDER FEDERAL RULE OF
CRIMINAL PROCEDURE 12(b)

Comes now the defendant, by counsel, and moves the court to extend the deadline imposed at the arraignment for pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b). In support of this motion, the defendant would show the following:

1. That the defendant was arraigned on April 26, 2006 before Magistrate Rodovich. At the arraignment, Magistrate Rodovich ordered that pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b) must be filed within thirty (30) days after the arraignment.
2. The defendant has sought and been granted an extension of time through July 19, 2006 in which to file pretrial motions.
3. At the time of this filing, the government has provided certain discovery. On July 17, 2006, the government provided a computer disc containing the results of a forensic examination. The material contained in the disc appears voluminous and complex. Counsel continues to seek from the government clones of the hard drives and

discs analyzed by the government so that the defense can present the same to its own expert. Only after this discovery is complete, and the defense has had a chance to review the same, will the defense be able to file appropriate pretrial motions.

4. The government has sought and been granted a continuance of the trial until August 14, 2006. The defense has not sought nor been granted any continuance of the trial.

5. The defense has filed a motion to suppress the defendant's statements to agents, and a hearing is set July 20, 2006 at 1:00 p.m.

6. Counsel needs additional time to file pretrial motions including, but not limited to, motions concerning the aforementioned forensic computer examination.

WHEREFORE, the defendant requests that the court grant an extension of fourteen(14) days for which the defendant to file pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b), and for all other just and proper relief.

DATED this 19th day of July, 2006.

Respectfully submitted,

Northern District of Indiana
Federal Community Defenders, Inc.

By: s/John E. Martin
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CERTIFICATE OF SERVICE

I hereby certify that, on July 19, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/CM/ECF system which sent notification of such filing to the following:

Philip Craig Benson
philip.benson@usdoj.gov

and I hereby certify that I have mailed the document by U.S. Postal Service to the following non CM/CM/ECF participants:

s/ John E. Martin